

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PATRICIA NOCE, ET AL.,

CASE NO. 04-337 ERIE

PLAINTIFFS,

JUDGE SEAN J. McLAUGHLIN

vs.

**MOTION TO ADMIT
JEFFREY A. FORD, JD.,
PRO HAC VICE**

CAWA, INC., ET AL.,

DEFENDANTS.

Now come Plaintiffs Patricia Noce and Leota Noce, by and through the undersigned legal counsel, a member of the bar of the State of Ohio, and moves this Court for admission *pro hac vice* of Jeffrey A. Ford, JD., an attorney admitted to practice law and in good standing with the highest Court of the State of Ohio and a partner in the lawfirm of Andrews & Pontius LLC. This request is being made so that Jeffrey A. Ford might appear in this matter with the undersigned as co-counsel for Plaintiffs, for the reasons set forth hereinafter.

The undersigned and Clair M. Carlin, 62 S. Main Street, P.O. Box 5369, Poland, Ohio 44514, an attorney admitted to practice law in the States of Ohio **and Pennsylvania** and the undersigned, have been acting as co-counsel in the captioned matter for Plaintiffs. The undersigned was admitted *pro hac vice* upon the motion of Mr. Carlin.

Clair M. Carlin died suddenly and unexpectedly on Wednesday, July 6, 2005 while attending his son's wedding in Honolulu, Hawaii.

The undersigned and his partner Jeffrey A. Ford are admitted to practice law in the United States District Court for the Northern District Of Ohio, and the undersigned is admitted to practice law in the United States Court of Appeals for the Sixth Circuit and the Supreme Court of the United States of America.

The Plaintiffs respectfully request that Jeffrey A. Ford be admitted *pro hac vice* upon this motion to appear with the undersigned as co-counsel for the Plaintiffs herein so that this matter might proceed on an uninterrupted basis.

An affidavit of Jeffrey A. Ford submitted in support of this motion is attached as Exhibit 1.

Respectfully submitted,

David E. Pontius 0004781
ANDREWS & PONTIUS LLC
4817 State Road, Suite 100
P.O. Box 10
Ashtabula, Ohio 44005-0010
Phone: 440.998.6835
Fax: 440.992.6336
E-Mail: dpontius@andrewspontius.com

CERTIFICATION

I hereby certify that a copy of the foregoing was mail by regular U.S. mail this _____ day of July, 2005 to **G. Jay Habas**, Attorney for Defendant, 1001 State Street, Suite 1400, Erie, Pennsylvania 16501.

David E. Pontius